

**ORIGINAL**

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

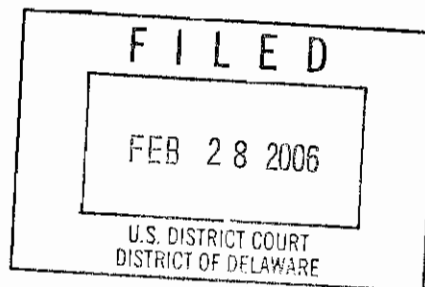
MONTY C PEPPER  
V  
THOMAS CARROLL  
BAMBI THOMAS  
JAMES GARDELS  
THOMAS SEACORD

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( C.A.No. 05-084-JFF  
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(

PLEASE TAKE NOTICE that the attached Reply To Defendants ansure  
To Writ of Mandams and Memorandum IS HEREWITH PRESENTED  
TO THE COURT

PLAINTIFF in filling on or about February 15 2005 a complaint was  
filed in Federal District Court for the District of Delaware against  
Thomas Carroll Bambi Thomas James Gardels Thomas seacord case (D.I.2)

PLAINTIFF in ~~ansuring~~ reply the above presents this to the  
HONORABLE COURT



DATED THIS DAY 23 OF February 2006

A handwritten signature in dark ink, appearing to be "M. C. Pepper", written over a horizontal line.

MONTY C PEPPER  
1181 Paddock Rd  
Smyrna DEL 19977

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

MONTY C. PEPPER

Plaintiff

Vs.

C.A. No: 05-084-JJF

THOMAS CARROLL et.al.

Now Comes The Plaintiff To argue To The Court To UPHold and affirm writ of Mandamus Permanent Injunction DI 25 in a fashion that can be agreed upon by The Plaintiff To afford The Plaintiff with Time To research on day Time hours 9 ~ 2:30 and consider ways To improve Time That is aloted by possable allowing Photo Copys of law for inmates To Take To Their cell, or as To Plaintiff.

This would be in The best intrest To Justice and public where if a small fraction of 2400 inmates were To request Law Library Time There would be no relief possable,

Plaintiff in The following memorandum shows

That only 3-10 inmates at a average are in The Law Library and The Defendant Carroll has not Produced fact other wise. There for Plaintiff added Time would put no one out and There exist a second room That is not used

Further Plaintiff shows That PLRA rules have been exhausted all available remedy Further shows That a civil federal a criminal and civil state cases all are active and further are shown to have actual success

Plaintiff Shows That Law Library Time is used moastly for copying case law and law or Rules instead of research. And as far as S.H.U. Law Library Plaintiff shows That questions asked and Law requested do not fall within Time liments of Mr Engrams

Affidavit This issue is moot as far as This instant Mandamus is concern but not as The damages action is concern

Plaintiff shows That he Lost his withdraw of plea Failed To file a Petition to return Property which was so legally deficient it was not even sent and further a motion for reduction of sentence That To was

so poorly written it failed

The damage that the defendants is non issue where no money has to be spent except for paper if Photo Copying was demanded by this Court

Plaintiff to show that he would have prevailed on motions and cases. The Court would have to retri each but the Post Conviction Motion 61 (Exhibit F) does show evdence of ineffective counsel as well a Procedural errors in Superior Court

Plaintiff does contend that Defendants counsel did cause prejudice to the Plaintiff where the Sentencing order added to their ansure was purposely to bring to light the charges of the Plaintiff. Plaintiff on page explains to a point but will put fourth that because of the Sentencing Guidelines Manditory and minum manditory sentencing and addictions the Plaintiff did plea to something he did not do, and was threaten with 140 years in prison, as a single father this entire situation has devastated everyone involved and Plaintiff is beyound remorse full and feels the court and Prosecution Sentenced him with a closed mind

This is why Plaintiff is seeking To correct his sentence and charges against him. Plaintiff's back ground was never considered nor was The accuser put on a Lie detector if she had she "would" fail.

These are part of Constitutional Questions of law That The Plaintiff seeks To attack a unfair Sentencing guidelines , extream sentences To force a plea not because Their Just , Courts with Closed Minds as To addictions and UnConstitutional mandatory and minum mandatory Sentencing where The Judge is removed From Judgement . and meaningFull Rehabilitation in prisons as well as befor prison.

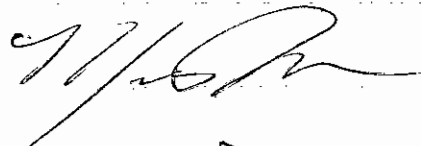
Plaintiff's son Matthew Pepper is The most harmed where he lost his father has no mother only grand Parants who are God sent . The fear of The prison moving The Plaintiff From Delaware or D.C.C. would devastate him as well as The Plaintiff where The restraining order will be dropped.

Plaintiff also asserts The prejudice by Attorney Genrals Office where They were notified of The abuses and did nothing untill The instant action Than defended The perpetrators

Plaintiff asserts that he did have a addiction to internet Pornography and sought help for that addiction and this to ment nothing to the court

Plaintiff The court to consider the falling memorandum and under stand the situation the Plaintiff is in as well as others and find in favor of the Plaintiff

Feb 21 2006



Monty Pepper

Certificate of Service

I Monty Pepper here by certify  
That I have served a True And correct copies  
To/of The attached Reply To Defendants  
Ansurs To writ of Mandamus upon The following  
parties / person

To Lisa Barchi  
Deputy Attorney General  
820 N French Street 6th floor  
Wilmington Del 19801

Monty Pepper  
DCC  
11840 Paddock Road  
Smyrna Del  
19977

By Placing same in a sealed Envelope and  
depositing same in The United State Mail at Th  
Delaware Correctional Center Smyrna Del 19977

on This day 21 of February 2006



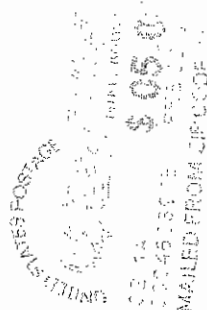
IM m Pepper

SBI# 156920 UNIT DW

DELAWARE CORRECTIONAL CENTER

1181 PADDOCK ROAD

SMYRNA, DELAWARE 19977



**U.S.M.S.  
X-RAY**

Office of The Clerk  
United States District Court  
844 N King Street Box 18  
Wilmington Del  
19801-3570

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